

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ARTURO ESPARZA MACIAS, et al.,)
)
Plaintiffs,)
)
v.) Case No. 3:19-cv-00830
)
MONTERREY CONCRETE, LLC, and)
JOSE DE LA ROSA,)
)
Defendants.)

NOTICE OF DEPOSITION
Jaime Marquez Esparza

PLEASE TAKE NOTICE that the Defendants, Monterrey Concrete LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Jaime Marquez Esparza at McGuireWoods 800 Canal Street, 18th Floor, Richmond, Virginia 23219 **on Friday , September 11, 2020 at 10:00 a.m.** Such deposition shall be continued from day to day and from place to place until the same shall be completed. The testimony will be recorded by stenographic and/or videotape means.

Mr. Marquez Esparza is requested to bring the documents identified at Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 28, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

Robert F. Redmond, Jr. (VSB No. 32292)

Mitchell D. Diles (VSB No. 92202)

McGuireWoods LLP

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*Counsel for Defendants Monterrey Concrete, LLC
and Jose De La Rosa*

EXHIBIT A

Any and all documents related to Plaintiff's claims and all documents received by you from Plaintiff's counsel.

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2020, I served the foregoing on Plaintiffs' counsel via Fedex.

Preston Smith (VA Bar # 86908)
Ian Hoffman (VA Bar # 75002)
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/s/ Robert F. Redmond, Jr. _____

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MONTERREY CONCRETE, LLC, and)
JOSE DE LA ROSA,)
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Defendants.)

NOTICE OF DEPOSITION OF PLAINTIFF MANUEL MARQUEZ ESPARZA

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Manuel Marquez Esparza at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Thursday, October 1, 2020 at 10:00 a.m.** The deposition shall continue from day to day, and from place to place, until complete. The deposition will be recorded by stenographic and/or videographic means.

Mr. Marquez Esparza is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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/s/ Robert F. Redmond, Jr.

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NOTICE OF DEPOSITION OF PLAINTIFF LEOPOLDO GONZALES

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Leopoldo Gonzales at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Friday, October 2, 2020 at 10:00 a.m.** Such deposition shall be continued from day to day and from place to place until the same shall be completed. The testimony will be recorded by stenographic and/or videotape means.

Mr. Gonzales is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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*Counsel for Defendants Monterrey Concrete, LLC
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/s/ Robert F. Redmond, Jr.

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NOTICE OF DEPOSITION OF PLAINTIFF URIEL CISNEROS

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Uriel Cisneros at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Wednesday, October 7, 2020 at 10:00 a.m.** The deposition shall continue from day to day, and from place to place, until complete. The deposition will be recorded by stenographic and/or videographic means.

Mr. Cisneros is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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*Counsel for Defendants Monterrey Concrete, LLC
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/s/ Robert F. Redmond, Jr.

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NOTICE OF DEPOSITION OF PLAINTIFF ALONSO CISNEROS AYALA

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Alonso Cisneros Ayala at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Thursday, October 8, 2020 at 10:00 a.m.** The deposition shall continue from day to day, and from place to place, until complete. The deposition will be recorded by stenographic and/or videographic means.

Mr. Cisneros Ayala is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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*Counsel for Defendants Monterrey Concrete, LLC
and Jose De La Rosa*

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/s/ Robert F. Redmond, Jr.

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NOTICE OF DEPOSITION OF PLAINTIFF CESAR IVAN ESPARZA AGUILAR

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Cesar Ivan Esparza Aguilar at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Friday, October 9, 2020 at 10:00 a.m.** The deposition shall continue from day to day, and from place to place, until complete. The deposition will be recorded by stenographic and/or videographic means.

Mr. Esparza Aguilar is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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*Counsel for Defendants Monterrey Concrete, LLC
and Jose De La Rosa*

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/s/ Robert F. Redmond, Jr.

EXHIBIT A

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MONTERREY CONCRETE, LLC, and)
JOSE DE LA ROSA,)
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NOTICE OF DEPOSITION OF PLAINTIFF VICTOR DE LOS REYES RABANALES

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Victor de los Reyes Rabanales at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Tuesday, October 13, 2020 at 10:00 a.m.** The deposition shall continue from day to day, and from place to place, until complete. The deposition will be recorded by stenographic and/or videographic means.

Mr. Reyes Rabanales is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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*Counsel for Defendants Monterrey Concrete, LLC
and Jose De La Rosa*

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/s/ Robert F. Redmond, Jr.

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NOTICE OF DEPOSITION OF PLAINTIFF LUIS CARLOS ROMERO

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Luis Carlos Romero at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Wednesday, October 14, 2020 at 10:00 a.m.** The deposition shall continue from day to day, and from place to place, until complete. The deposition will be recorded by stenographic and/or videographic means.

Mr. Carlos Romero is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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*Counsel for Defendants Monterrey Concrete, LLC
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NOTICE OF DEPOSITION OF PLAINTIFF REUEL VILLAGRANA CANALES

PLEASE TAKE NOTICE that Defendants Monterrey Concrete, LLC and Jose De La Rosa, by counsel, will take the deposition of Plaintiff Reuel Villagrana Canales at McGuireWoods LLP located at 800 East Canal Street, 18th Floor, Richmond, Virginia 23219 **on Thursday, October 15, 2020 at 10:00 a.m.** The deposition shall continue from day to day, and from place to place, until complete. The deposition will be recorded by stenographic and/or videographic means.

Mr. Villagrana Canales is requested to bring all documents identified in the attached Exhibit A to the deposition.

You are invited to attend and participate.

Dated: August 31, 2020

Respectfully submitted,

/s/ Robert F. Redmond, Jr.

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